

## Considerations and Implications of Including a Risk Management Approach in Section 5.5

### Pros

- Memorializes the risk management approach as an alternative to traditional engineering controls.
- Provides specific requirements and protocols to evaluate risk of exposure.
- Potential to reduce some required engineering controls (i.e., wetting and wind shutdowns) if risk criteria are met.

### Cons

- Setting regulatory requirements reduces flexibility and the ability to use different criteria based on site specific considerations.
- The science and application of risk assessment/management related to asbestos is still evolving. So, the flexibility and ability to use new and evolving concepts/approaches may be limited if a risk management conceptual model is incorporated in the Regulations.
- There is no nationally accepted standard approach for establishing several of the key exposure parameters. For these items, we would like to have the flexibility to establish exposure parameters on a site specific basis.
- It is difficult to reach consensus on a standard approach and set of assumptions for use on all sites (e.g. the number of air samples that would be sufficient on one site may not be sufficient on another site).
- Use of the risk management approach will likely result in increased cost of air monitoring compared to the traditional management approach. The risk approach necessitates that all air samples be analyzed by TEM, eliminating the cost savings of PCM analysis allowed by the traditional management approach. Costs of analysis of air samples may further increase due to increased analysis time to reach desired analytical sensitivities and additional costs for rush analysis of air samples.
- The risk management approach provides a **limited** ability to reduce controls required for traditional approach. Many provisions/minimum standards (e.g. disposal, decontamination, stabilization, training, etc.) would still be required.
- The risk management approach may take longer to finalize than the rest of the Regulation, and thereby could hold up the promulgation of a revised Section 5.5.

### Other Considerations

- The revised Section 5.5 will only require air monitoring if an Adjacent Receptor Zone is within 150 feet of the RWA; therefore, the utility of following a formal risk management approach is limited to projects with Adjacent Receptor Zones.
- A risk management approach can still be used even if the specific requirements aren't incorporated in the regulation, and this fact could be explicitly stated in the Regulation. The risk management approach could still be implemented by employing a site specific plan that would require CDPHE approval.

### Recommendation

The current recommendation is that the risk approach be captured in a guidance document for use by those interested in applying this approach.